

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA	§	
v.	§	EP:23-CR-00466(1)-KC
MIGUEL ANGEL DELGADO JR.	§	

DEFENDANT’S MOTION TO PRODUCE

To the Honorable Judge of Said Court:

Defendant MIGUEL ANGEL DELGADO JR., through his attorneys of record, Eduardo N Lerma, Sr., and Veronica T. Lerma, respectively, moves this Court for an Order pursuant to the Court's Standing Discovery Order and the constitutional due process mandates enunciated in *Brady v Maryland*, 373 U.S. 83 (1963), directing the Government to permit discovery inspection or copying of the following:

I.

Defendant requests that the Government furnish copies of or make available to for inspection and copying the following documents:

- 1) The Significant Incident Report(s) issued for the incident alleged in Count I.
- 2) The Significant Incident Report(s) issued for the incident alleged in Count I.
- 3) The Significant Incident Report(s) issued for the incident alleged in Count II.
- 4) The Significant Incident Report(s) issued for the incident alleged in Count II.
- 5) The Employment Departure Report issued to Defendant MIGUEL ANGEL DELGADO JR.

II.

That requested production is crucial to the defense and is discoverable under *Brady*.

III.

Wherefore, Premises Considered, Defendant MIGUEL ANGEL DELGADO JR. respectfully prays the Court grant Defendant's *Motion to Produce*, in all things, as expeditiously as possible.

Respectfully submitted,

Eduardo N. Lerma, Sr. Law Offices

1417 Montana Avenue

El Paso, Texas 79902

Tel: 915-533-0177

/s/ Eduardo N. Lerma, Sr.

Eduardo N. Lerma, Sr.

Texas State Bar No. 12221300

enl1417@aol.com

Veronica Teresa Lerma

LERMA LAW

1417 Montana Avenue

El Paso, Texas 79902

T.: 915.533.4779

/s/ Veronica Teresa Lerma

Veronica Teresa Lerma

Texas State Bar No. 24062846

vtlermalaw@gmail.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that on April 03, 2024, a copy of this *Motion to Produce* was electronically served using the efilings system in accordance with the Federal Rules of Criminal Procedure to all parties:

/s/ Eduardo N. Lerma, Sr.
Eduardo N. Lerma, Sr.

/s/ Veronica Teresa Lerma
Veronica Teresa Lerma

Attorneys for Defendant